

July 9, 2009

Dr. Scott A. Masten
Director, Office of Chemical Nomination and Selection
National Toxicology Program
National Institute of Environmental Health Sciences
P.O. Box 12233, MD K2-02
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PETA

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

HEADQUARTERS
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Dear Dr. Masten,

The following comments are submitted on behalf of the more than 2 million members and supporters of People for the Ethical Treatment of Animals (PETA) and the Physicians Committee for Responsible Medicine (PCRM) in response to the nominations of substances to the NTP for study in 2009 (May 27, 2009; Federal Register 74(100):25241). Our organizations are committed to using the best available science to protect animals from suffering and to promote the acceptance of human-relevant methods for risk assessment.

Specific comments are submitted for 1-chloro-4-(trifluoromethyl)benzene, deoxynivalenol, dong quai, indium tin oxide and tris(4-chlorophenyl)methane and tris(4-chlorophenyl)methanol. The NTP has recommended additional animal tests for these substances that would result in the poisoning and death of thousands of animals if carried out. In each case, we urge the NTP to thoroughly consider potential human exposure, existing toxicity data and the application of non-animal test methods in order to avoid unnecessary and duplicative animal tests.

Five years ago, the NTP's *Roadmap for the Future* emphasized the importance of elevating toxicology to a predictive science focused on target-specific, mechanism-based biology. It is long past time for the NTP to begin incorporating this new approach rather than to continue relying exclusively on the standard battery of toxicity tests regardless of relevance or applicability.

Thank you for your attention to these comments. I can be reached at (757) 622-7382, ext. 8001, or by e-mail at josephm@peta.org.

Sincerely,


[Redacted]

Joseph Manuppello, MS
Research Associate
People for the Ethical Treatment of Animals


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